ORIGINAL

Before the Federal Communications Commission Washington, D.C. 20554

In re Matter of

MM DOCKET No. 94-29

Amendment of Section 73.202(b) Table of Allotments

Table of Allotments FM Broadcast Stations

(Willows and Dunnigan, CA)

RECEIVED

JUN 2 1 199.

FERMI COMMUNICATIONS COMMUSSION

OFFICE OF SECRETARY

To: John A. Karousos

Acting Chief, Allocations Branch

REPLY COMMENTS OF PETITIONER

Robert Lewis Thompson
PEPPER & CORRESINI, L.L.P.
1776 K Street, N.W., Suite 200
Washington, D.C. 20006
(202) 296-0600

Counsel for Pacific Spanish Network, Inc.

June 21, 1994

No. of Copies rec'd_ List A B C D E

Summary of Reply Comments

The supporting Comment filed by Birdsill [KCFM] presents a separate and independent public interest reason -- in addition to reasons advance by Petitioner -- why the proposed Rule Making should be adopted. The four opposing Comments -- each one filed by a potential radio competitor of Petitioner -- advance meritless arguments aimed at stifling competition and denying a first local broadcast service to a growing community. As the NPRM correctly found, Dunnigan is precisely the type of established, developing community that is deserving of a "first local broadcast service" allocation by the FCC. That public interest factor -- and other factors -- outweigh the interests of Willows, CA in maintaining a second local transmission facility, particularly when Willows receives service from more than nine (9) radio stations and where the FM facility at issue cannot otherwise be upgraded to B1 status. Finally, notwithstanding the anti-competitive, self-serving protestations of four existing Sacramentomarket radio stations that PSN is attempting an "unlawful movein" to "their" market, the proposed Rule Making is completely consistent with FCC precedent. Although these potential competitors of PSN seek to mislead the Commission into serving their narrow anti-competitive purposes, the public interest and the residents of the Dunnigan community will be best served in this case by adoption of the proposed Rule Making.

Table of Contents

Summary	of Reply Comments	i
Discussi	lon	2
ı.	Dunnigan Is A Community for Allotment Purposes	2
II.	Dunnigan's Need for First Local Service Is Greater Than Willow's Need To Maintain Second Local Service	
III.	This Is Not An Unlawful "Move In"	9
Conclusi	on	.4

RECEIVED OFFICE OF SECRETARY

Before the Federal Communications Commission OFFICE OF SECRETARY OFFICE OF SECRETARY

In re Matter of) MM DOCKET No. 94-29
Amendment of Section 73.202(b) Table of Allotments FM Broadcast Stations)))
(Willows and Dunnigan, CA))
)

To: John A. Karousos Acting Chief, Allocations Branch

REPLY COMMENTS OF PETITIONER

Pacific Spanish Network, Inc. ("PSN"), Petitioner's successor-in-interest 1 , respectfully submits these Reply Comments in support of the proposed Rule Making, whereby Channel 288B1 would be substituted for Channel 288A at Willows, CA, and Channel 288B1 would be reallocated from Willows to Dunnigan, CA. 2/

Mollowing consummation of the assignment application, Pacific Spanish Network, Inc. ("PSN") became the licensee of KQSC (FM) [formerly KIQS (FM)], Willows, CA and, thus, PSN has succesded to the interests of Petitioner KIQS, Inc. for purposes of this Rule Making.

Comments were filed on June 1, 1994, by PSN and on June 6, 19 by Fuller-Jeffrey Broadcasting Corporation of the Sacramento Valley ("Fuller-Jeffrey"), KZSA Broadcasting, Inc. ("KZSA"), River Cities Radio, L.P. ("River Cities"), Michael Robert Birdsill ("Birdsill"), and [jointly] by Genesis Broadcasting, Inc. and Tribune Broadcasting Co. ("Genesis/Tribune").

Discussion

I. DUNNIGAN IS A "COMMUNITY" FOR ALLOTMENT PURPOSES

- 1. Three of the six Comments filed in response to the NPRM questioned the Commission's initial finding that Dunnigan is a "community" for allotment purposes. See NPRM, DA 94-306, MM Docket No. 94-29, released April 15, 1994, at ¶ 4. The evidence overwhelmingly supports the Commission's determination that Dunnigan is a "community" for allotment purposes.
- 2. River Cities asserts (Comments at 2) that Dunnigan is merely "a wide spot in the road with a post office and general store" and that it has "two (maybe three) businesses" (id. at 10). In fact, the very Pacific Bell telephone book relied on by River Cities lists Dunnigan as a community and, in its Business White Pages, identifies at least 28 business establishments including stores, churches, motels, camping grounds, restaurants, gas stations, an adult residential care facility, a golf course etc. See Appendix A hereto. 3/ Contrary to other claims by opponents, Dunnigan does have civic organizations and emergency medical care. See Appendix N hereto. 4/

J PSN respectfully submits that River Cities' representations to the Commission about the contents of the Pacific Bell phone listings for Dunnigan were less than candid.

KZSA falsely claims (at 7) that "Dunnigan lacks a focal point" but is merely two separate areas. In fact, Dunnigan was bisected twenty years ago by I-H 5. Most residential development has simply taken place in the Harwood Subdivision, on the west side of the Interstate. See Petition at Exhibit B, page ES-1.

- 3. Moreover, River Cities presented a "pictorial" view of Dunnigan that was grossly misleading. The four severely "cropped" photographs selected by River Cities (Comments at Exhibit C) falsely imply that there are only three buildings in Dunnigan. In fact, there are approximately 175 dwelling units ^{5/} and several dozen businesses/public buildings in Dunnigan, including the Dunnigan General Store, the Post Office, the Dunnigan Water District building, the Dunnigan Fire Department, Dunnigan Mini Mart, motels, restaurants, service stations, churches, a residential subdivision etc. See Appendix B (photographs of these). River Cities is thus plainly wrong when it boldly claims that Dunnigan has no shopping (Comments at ¶ 3) or churches (id. at ¶ 4) or local governmental services (id.). 6// See Appendix N.
- 4. Furthermore, River Cities is also flatly wrong (Comments at note 3) in claiming that Dunnigan cannot be a "community" for FCC allotment purposes because it is not a census designated place. U The FCC long has held that it will recognize any "geographically identifiable population grouping" as a "community" for allotment purposes. See FM Channel Policies/Procedures,

^{5/} See Exhibit B to the Petition, at II-2 (chart).

River Cities also falsely criticizes the Commission (Comments at note 6) for finding that Petitioner presented evidence from an elected county official who River Cities alleges is only an "assistant county planner." In fact, the Commission was correct and River Cities was wrong. Petitioner presented Statements supporting the proposed allotment to Dunnigan from both a county planner and an elected county official. See Exhibits A and D to the Petition for Rule Making (hereinafter "Petition").

 $^{{\}cal U}$ KZSA concedes (Comments at 8) that Dunnigan's unincorporated status is not determinative of the "community" question.

90 FCC 2d 88, 101 (1982); see also FM Assignments, 5 FCC Rcd 934, 934-5 (1990) (Semora, NC, held to be a "community" even though it is not a CDP and has no local government). ³/ The FCC has also emphasized that "the standard to be applied in determining whether a specified locality is a 'licensable' community is not a stringent one." See Beacon Broadcasting, 2 FCC Rcd 3469, 3470 ¶ 9 (1987). The United States Geological Service of the federal Department of the Interior has recognized Dunnigan as a community in its "Dunnigan Quadrangle." ⁹/ Accord Appendices A, D and E.

5. Both River Cities (Comments at note 3) and Genesis/Tribune (Joint Comments at 3) question whether the population of
Dunnigan is "approximately 700," as stated by Petitioner, or only
495, as stated in the "Town of Dunnigan General Plan" (Petition
at Exhibit B, II-2). There is no discrepancy. The latter figure
is at least three years old (id.) and the "approximately 700"
figure was given to Petitioner six months ago by a county planner
(see Petition at Exhibit A). In any event, the population argument is largely irrelevant, inasmuch as the FCC recently has
allocated an FM channel to another California "community" with as
few as 419 residents 10/ and, just four years ago, allocated an

[§] See Petition at 3-4 (cases cited).

⁹ See Appendix C hereto.

^{10/} See Pt. Arena, CA, DA-93-1389, released December 13, 1993.

FM station to a North Carolina "community" with a population of only 150. 11 /

- 6. KZSA criticizes the Commission (Comments at 7) for concluding that Dunnigan has "identifiable boundaries." River Cities, however, appears to concede (Comments at 2, note 4) that Dunnigan has "identifiable boundaries." Of course, not only did Petitioner cite to the boundaries described in the "Town of Dunnigan General Plan" but also notes that the Yolo County Zoning Map No. 17 shows the clearly delineated boundaries for the community of Dunnigan. See Appendix D hereto.
- 7. In short, there is overwhelming probative evidence that Dunnigan is a recognized "community" 12/ and most certainly is an "identifiable population grouping" as that term has been defined by the FCC. 13/

II. DUMMIGAM'S NEED FOR FIRST LOCAL SERVICE IS GREATER THAN WILLOW'S NEED TO MAINTAIN SECOND LOCAL SERVICE

8. Three of the six Comments argue that Dunnigan's need for a first local transmission service is not as great as Willow's

^{11/} See FM Assignments, supra, 5 FCC Rcd at 934-5.

^{12/} For example, the 1990 Rand McNally map of "Yolo, Glenn and Colusa Counties" not only shows Dunnigan as a town on Interstate 5 but has a separate town "inset" for Dunnigan. See Appendix E. Indeed, "Dunnigan" is a named town on the Interstate 5 highway signs. See Appendix F (photos showing "Dunnigan" as town on Interstate Highway 5).

See Statement of County Supervisor, attached as Appendix G ("long been an established community").

need to maintain a second local service. This argument is based on a series of false factual premises.

- 9. First, it is clear that the provision of a first local transmission facility is one of the Commission's highest allotment priorities. See Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88, 92 (1982). It is indisputable that Willows has two (2) local transmission facilities and Dunnigan currently has none.
- 10. Genesis/Tribune assert (Comments at 5-6), however, that the removal of one of Willow's only two local radio stations -- its only FM station -- is contrary to the public interest because it "does not appear" that any other FM station is available to Willows. They are wrong. While the updated FM engineering database reveals that the recent filing of an FM application for Point Arena, CA, voids the use of Channel 272A for Willows, it is clear that Channel 292A can be allocated to Willows. 14/
- 11. Moreover, it is clear that, compared to Petitioner's currently licensed Channel 288A facility, available Channel 292A would be a <u>superior</u> FM facility for Willows. As explained by Petitioner's engineering consultant, Channel 292A would be a <u>superior</u> allotment to Willows because the population and land area within the 60 dBu contour of a Channel 292A facility for

^{15/} As explained in the Engineering Statement attached hereto as Appendix H, approximately 88 percent of the city of Willows falls within the 70 dBu contour produced by the fully spaced Channel 292A facility. Hence, an allotment of Channel 292A can be made to Willows in substantial compliance with Section 73.315(a) of the Rules.

Willows would exceed those within the licensed KQSC (FM) 60 dBu contour. 15/

- 12. Genesis/Tribune also speculate (Comments at 5) that the continuing viability of existing station KIQS (AM) at Willows is questionable. The owner of that radio station directly refutes that assertion. 16/
- 13. KZSA also asserts (Comments at 2) that neither Willows nor Glenn County would likely receive any service from the upgraded FM facility at Dunnigan. That is neither a sufficient reason to deny this proposal nor necessarily even factually correct. A study by Petitioner's engineering consultant demonstrates that, should the transmitter site for the Dunnigan station ultimately be located north of the site hypothetically chosen for purposes of the Petition, Willows and southeastern Glenn County would be within the Dunnigan station's 54 dBu protected contour. 17/
- moval of service" from one community and its reallocation to another community is warranted if sufficient public interest factors are present. In this case, there are substantial public interest factors in favor of such a reallocation. First, Dunnigan is entitled to a "first local service" preference over Willows. Dunnigan is not only a "community," it is deserving of a

^{15/} See Engineering Statement, attached as Appendix H.

^{16/} See Appendix I.

^{17/} See Appendix J.

first local service preference. Dunnigan is projected to be one of the highest growth towns in the entire Yolo County in the next 20 years. 18/ One development project will bring to Dunnigan both an industrial park on 62 acres and also a commercial center on 20 acres that will provide 150-250 jobs on completion during the next four years. 19/ That same company is working with two agri-businesses to locate near Dunnigan and to employ up to 200 persons. 20/ In addition, another firm is involved in a 50-acre commercial project in Dunnigan and a 700-home residential project is being planned for Dunnigan by Lakemont Development, Inc. 21/ In short, Dunnigan is poised to grow, by percentage terms, much faster than the Yolo County cities of Woodland, Davis and Esparto -- each of which has been allocated at least one FM station by Second, the proposed reallocation will result in the most efficient use of the radio spectrum. Not only will Petitioner realize an opportunity to upgrade its FM service from

^{15/} See Sacramento Area Council of Governments, Regional Data Center, "Projections 1992-2015," excerpts attached as Appendix K (Dunnigan/Knights Landing housing and population "will more than double" by 2015).

^{19/} See Letter from Ken Reiff of The Elkins Co., Inc., attached as Appendix L.

^{20/} Id.

^{21/} See Appendix N.

<u>See SACG "Projections 1992-2015," supra, attached as Appendix K.</u>

Class A to Class B1 23/ but available Channel 292A would be a superior FM channel at Willows compared to Petitioner's currently licensed Channel 288A facility. 24/ Third, no other FM channel of any class is available for allotment at Dunnigan as an alternative to Channel 288B1. 25/ Fourth, the reallocation of Petitioner's Channel 288 to Dunnigan would result in the separate and independent upgrade of another FM station in a rural area of northern California. 26/ Any one of these public interest factors would be sufficient to outweigh the conditional interest in retaining a second local service at Willows; and, in any event, a superior FM allocation for Willows is available and will be sought. 27/ Taken together, the public interest in the proposed reallocation is manifest.

III. THIS IS NOT AN UNLAWFUL "MOVE IN"

15. Four of the Comments contend that, even if Dunnigan is deserving of the proposed new FM allotment, it should be denied because it is an unlawful "move-in" from an underserved rural area to a suburb of an adjacent, overserved urban market. Three

River Cities concedes (Comments at ¶ 11) that the FCC long has recognized the public interest benefit from a licensee's maximizing the power of its station.

^{24/} See discussion, supra, ¶ 11.

^{25/ &}lt;u>See</u> Engineering Statement, <u>supra</u>, Appendix H.

^{26/} See Comments of Michael Birdsill, dated June 2, 1994.

^{37/} See Appendix I.

of the Comments plead that the FCC's decision in the 1991 <u>Sandy</u>

<u>Springs</u> case mandates denial of Petitioner's proposal. Once

again, these potential competitors — who desire merely to stifle

any new competition — reach an erroneous conclusion through a

series of factually flawed premises. ²⁸/

- 16. In its 1990 decision modifying the rules for specifying a new community of license, the FCC noted that it would be hesitant to permit an FM station in an <u>underserved</u> rural area to be moved to a <u>suburb</u> of an <u>adjacent</u>, <u>overserved</u> urban market. <u>See</u> Community Modifications, 5 FCC Rcd 7094, 7096 (1990). This is not such a case.
- detailed in PSN's Comments, both the proposed gain and loss areas are "well served" under the Commission's definition because they each receive at least five radio services. In fact, Willows is better served than Dunnigan in that "every person residing within the proposed loss area will continue to receive at least nine aural receptions services and over 76 percent of the population will continue to receive eleven services." 29/ Moreover, another FM channel is not only available to Willows 30/ but

Even though Yolo County (and, thus, Dunnigan) may be within the Sacramento ADI (see KZSA Comments at Exhibit B), it is noteworthy that only four (4) opposing comments were filed from among the more than 30 operating stations in the ADI.

See Comments of Petitioner PSN, filed June 1, 1994, at Exhibit E-9. A reallotment to Dunnigan, in fact, would provide a sixth, seventh or eighth aural service to nearly 700 persons.

^{30/ &}lt;u>See</u> Appendix H.

- (i) it is <u>superior</u> to the current FM facility licensed to Willows 31/ and (ii) the current licensee of Willow's KIOS (AM) intends to apply for it. 32/
- 18. Second, Dunnigan is neither a "suburb" of Sacramento nor is Dunnigan "adjacent" to Sacramento. Dunnigan is in upper Yolo County, nearly 20 miles from Woodland (a non-contiguous suburb of Sacramento) and nearly 40 miles northwest of downtown Sacramento, which lies in a separate county. 33/ Understandably, there is no reference whatsoever to Sacramento in the Executive Summary of the "Town of Dunnigan General Plan." 34/ Rather, Dunnigan is a small town, alongside Interstate Highway 5 in northern California, that appears poised for commercial and residential growth during the next two decades. 35/ Indeed, it appears that Dunnigan will have the highest percentage growth of any town in Yolo County during the next two decades. 36/
- 19. Third, Petitioner's proposed reallotment is not an unlawful urban "move-in" but, rather, the only available means whereby its Channel 288A FM facility can be upgraded to Class B1.

 Indeed, Petitioner will be able to increase its 60 dBu service

^{31/} Id.

^{32/} See Appendix I.

^{33/} See Rand McNally map, attached as Appendix E.

See Petition at Exhibit B, page ES-1.

^{35/} See Appendix K.

^{36/} Id.

W See Appendix H; see also Petition at Exhibit E.

area by 354% and, in order to compete more effectively, be able to increase its potential audience from 10,542 to 161, 280. 38/
The upgraded Channel 288B1 is also the only FM Channel that can be allocated to serve the community of Dunnigan and, in fact, would not be available unless Petitioner upgrades its Willows Class A facility. 39/

- 20. Opponents reliance on the <u>Sandy Springs</u> case, 6 FCC Rcd 6580 (1991) is wholly inapposite. In fact, the <u>dissimilarities</u> between this "<u>upgrade</u> and community-change proposal" and that 1991 case are multitudinous:
 - -- Unlike this case, that proceeding began as a simple Class A allotment case but was transformed by a counter-proposal into a <u>downgrade</u> of an FM station from Class C to C1 (<u>id</u>., 6 FCC Rcd at 6580 ¶ 2);
 - -- Unlike this case, that proceeding implicated the FCC's minimum-spacing rules and the FCC concluded that a grant of the proposal "would require a waiver" of those rules and "would create a significant potential for new interference" (id., 6 FCC Rcd at 6581 at ¶ 6);
- -- Unlike this case, that proceeding involved charges that the proponent of the change was in violation of the FCC's anti-trafficking policies (id. at ¶ 8);

See Petition at Exhibit E, Statement p. 2.

See Appendix H.

- -- Unlike this case, that proceeding involved not merely the downgrading but the movement of an allotment approximately

 100 miles and across a state border (id.);
- -- Unlike Dunnigan, Sandy Springs was a directly adjacent suburb of Atlanta (Dunnigan is in a different county, nearly 40 miles away from Sacramento);
- -- Unlike the hypothetical site and the entire allotment area for Dunnigan in this case, the Sandy Springs proponent proposed to locate its antenna "in the city of Atlanta;" (id., 6 FCC Rcd at 6584 ¶ 24);
- -- Unlike Dunnigan's independent standing in this case,
 Sandy Springs was found by the FCC to be interdependent with
 the metropolis of Atlanta (id., 6 FCC Rcd at 6585 ¶ 26).
 Sum, none of the factors that led the Commission to deny a

In sum, <u>none</u> of the factors that led the Commission to deny a "first local preference" to Sandy Springs (and to deny that proposal) are present in this case.

21. Moreover, the "public interest" factors in favor of the reallotment to Dunnigan in this case are far greater than those presented in the <u>Sandy Springs</u> case. There, the Commission was concerned about the loss of Class C service to 400,000 persons. Here, the "loss" of Willow's second local service would affect approximately 10,000 persons. 40/ Most importantly, however, there was no alternate allotment for the loss area in the Sandy Springs case, while Channel 292A -- a <u>superior</u> FM channel for

But see Appendix J (showing possible 54 dBu service to Willows from fully-spaced Dunnigan site).

Willows -- is available in this case and the owner of Willow's other local station intends to apply for it. 41/ Furthermore, there are additional public interest factors favoring the Dunnigan proposal that were not present in the <u>Sandy Springs</u> case:

- -- the Dunnigan proposal is the only way that the licensee can upgrade its Class A facility to Class B1;
- -- the proposal is the only way that Dunnigan can receive its first local aural service;
- -- the proposal is the only way that first-adjacent FM Channel 287C2 at Shingletown can upgrade its facility to 287C1 at Shingletown; and
- -- the proposal will enhance minority ownership by permitting PSN's minority owner to maximize the service-area potential of this licensed FM facility; 42/
- 22. In sum, this proposal does not involve the type of urban "move-in" held to be unlawful by the Commission but, rather, would serve numerous public interest objectives.

^{11/} See Appendices H and I.

^{42/} The single majority owner of PSN is Jaime Bonilla Valdez, a Hispanic-American who resides in California. See Form 323 for KQSC (FM) [formerly KIQS(FM)], filed May 4, 1994 (official notice requested).

CONCLUSION

The Commission should not be fooled by a few potential competitors. This case is not <u>Sandy Springs</u>, <u>GA</u>. Petitioner's proposal should be adopted because it would provide the growing community of Dunnigan, CA, with its first local service as well as yield numerous other public interest benefits.

Respectfully submitted,

Robert Lewis Thompson

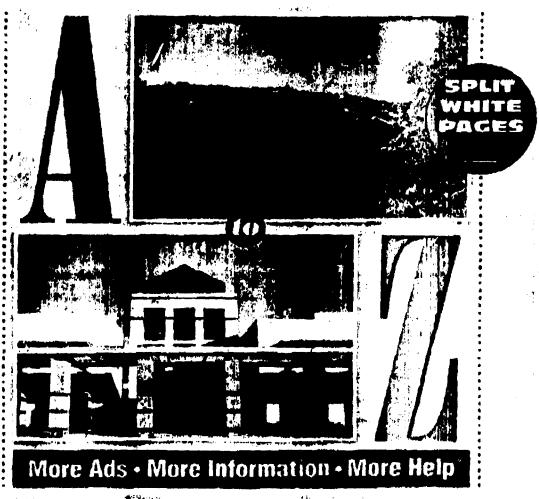
PEPPER & CORAZZINI, L.L.P. 1776 K Street, N.W. Suite 200

Washington, D.C. 20006

(202) 296-0600

Counsel for PSN

June 21, 1994





Yolo County Keep Until January 1995 Area Code 916

processing covermment agos.

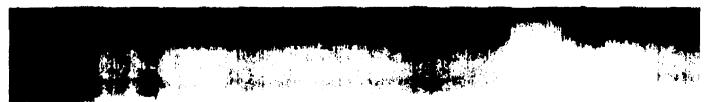
warm White Pages

TY ABBREVIATION	COMMUNITY	MOTTANYFREEL	COMMUNITY ABOREVIATION	COMMUNITY ASSITEVIATION
MITION OF) Capey Capey	BUPPEAN EL MACRIFO	Dunign El More	VACAVILLE(PORTION OF)	YOLO Yale Zanoka Zano
17100 (P) Din Din	ESPARTO		WINTERS WINTERS WINTERS	!
			WOODLAND	1

BUSINESS WHITE PAGES

Listings For Broderick-Bryte And West Sacramento Appear In The Sacramento Directory Listings For Capay Valley Immediately Follow This Section Of The Directory Listings For Knights Landing And Robbins Appear In The Knights Landing Directory

Nairy Specialists Of The Scrawton		A V 5 0 hys tripsta	Adams Douglas & LCSW 1621 On to Date . 753 398
	AIDS HOTLINE byte I (map) th Owner to Entry Proy	leys topotar	ADAMS GRAIN CO
med 1277 (1271 (1271 1271 1271 1271 1271 12	English & Georgia	(although)	10291M151 Willed
The state of the s	th Chara to Entry Persy 900 347 2437	Agent, Transminglate etstfrankil terminis 496 900	Admin to the Office And Chin
644 4030 441 4000 No Bodd 1971 9: 1044 759 0030 Air 78 8a 1724 040 784 6367			1207 FreeNACO Wood AAR 261
en 2114 Deck	No Charter To Custino Party	Auren-Buller Tax Services	Adoms Russel M Sanchez Consulting Sentions Enginer Schwaß & ABAMS Wide CO PAGE 393 ABAMS SCHWAß & ABAMS WOODLAND ELEVATOR 1970 (aug. 1970 Adoms Trucking inc 315 Metal 215 Wind 048 653 ADAMS TRUCKING INC.
ale's Adventionent	ABO-AMERICAN INTERNATIONAL MF6 CO	Abocus Lucyry Lithaudha Service 750 018	Engr 964 PO7
754 9653 F Salan (17 Whith Word 641 8147 Wing & Report 9 (314m Water 641 8147 714 7806 641 3125 Mary 13728 Man Water 643 3117 662 3996	1730 Fattre for Word	ABOUT CAMET OF WHAT AND	ADJUST THE CHANGE O CHANGE CO
ning & Seasts 1 (1944) Way 442 2673	A d Surreys Selenn 2215 Date	43/ Mat. Wald	ABAMS ECHNAR & ADAMS WOODLAND
714 7400	A-F's Sulpon 402 Yes Av Happy 787 3840 ALMA - Adoptes Liberty Mavement Asen	ABBEY ROAD PRESS	ELEVATOR 1970 EMSI WAY 562 638
	ALMA-Adoptes Liberty Movement Assn PR4m) \$1514 Learning 455 2562 MLC Attachistian	1271.4m Dark 786 452	L. Adams Trucking inc 151 hand in 31 want 948 652
B 12455 und Add *** 000 3771.	M.S. Attantiation	WEBOLL FAIR FCZAN YOME CHINNE CHRISTIAN SEARCH	ADAMS TRUCKING NC. 1470: 1470: 27 man. Adams Vegetable 98: 1470 Frenters when 642 146 Adams Vegetable 98: 1470 Frenters when 642 072
APO 7. TO 1	- No Charles to Calma Party	Abule Forms 661 023	Apparent Water half and Lazaren & West 642 166
	A.S. M. Fance & Construction 753 5799	Able Plot the	Adoms Venetalis Off 1470 FRentally by West 462 092
756 4929	A & M Landicaping	Able Property Management 757 494	ADAM'S 102 DRYEN
Leven Maintench	MATER Systems 1450-5th Davis	Appell Contactor & Half States Contactor Windows Co.	Highway Le World
1927 PAPE (A Sprin 758 2022	# Mrd Construction 1/1/ Date 758 4363	2514 Steamer # Sec ,734 376	Agáptiva Guskings Strategias 1353 (inspendrakej ar Cavil 758 573
MANUSTRANS AND	AMERICAN PROPERTY PROPERTY NAMED IN COLUMN PROPERTY PROPE	Abortion Birth Control Clinic /33 552	Adaptive Teachillant 4711 Days 758 136
ring 151) 1-00 Cole 756 651E	MAC Absumitation 100 702 4747 100 702 10 Calmb Party 100 702 4747 100 702 10 Calmb Party 100 702 4747 100 702 702 702 702 702 702 702 702 702 7	About Change Counseling Services	Adaptive Transitions (7) Fire 75 25 24 24 Additional Bolly Entanglist 75 75 ADIA PERSONNEL SERVICES
re Claus Traffie Bahani 753 2721	A & P Built 1374 (prod by Ward	433-14 WEST COM 130	ADIA PERSONNEL SERVICES
	ARA Tramportation inc See Laiding	Inc 641 933	25 (N) St Wmd
	ABCS Mortgage Inc - & Bank Of New York Co. 758 2727	Absolute	2 5151 Savereno 2000 200 200 200 200 200 200 200 200 2
100-Villature piteraration 2	₹	Absolute Collular 424 F Own 753 664	1 7791 New Cass Fallings
400 274 2041	T B C Pales Selates 5134 bit 14 Mei Mail And 1957	Absolute Mair By Logorn #1514 Mas. Wife 000 177	Adia Persianal Sarakus 371 252
Puty 800 274 2042	A & S Entree Service 2136 let in Scronens 989 1321 A & S Whelessiams 682 6669 ASAP Plumbing Heating & Cooling 685 5844 ASL X-Prees Pointing & Body Width	Alexante Window Ciderania Assessinti (1977 /2) 75.7	ADIA PERSONNEL SERVICES #27 (14) 57 Wind #46 543 276 197 North Lossy Fighted #46 543 276 North Lossy Fighted #46 543 276 North Lossy Fighted #46 543 707 428 179 #46 North Lossy Fighted #46 North Lossy Fighted #46 543 #46 Service #46 North Lossy Fighted #46 Service #46 Servic
	ASL X-Press Painting & Body Work	Aradama hitmatilanal finality Sarvicin	637-416 Bara .784 427
Park 500 274 2042	Hafren 19a 8 4240	Academy Informational Househ Services 423 Georgeon H. Date 753 244 ACADEMY PROPERTY: (115 Date 753 236:	Adoptes Liberty Margmant Assn-ALMA
e-Addiction information is	ATCO Space Rentals 764 9086	ACABIAN PROPERTIES	POTENTIAL PROPERTY AND A CONTRACT OF THE PROPERTY AND A CONTRA
	ATI	(25 F Davis	Edult Cay Mealth Contest 788 attended Willy 666 167
Party Community of the State of the Community of the Comm	ATT Min-binom top 14 by 245 marking 200 064 9471	Accelerated Comprehension Suminers 753 197	PO fin: 11531 * commente 485 224. Adoption Legal Services 7369 J fig. service Adult Day Mebilis Center 7316 personel toller 664 662. Adult Couraities 338 birshill sy Wilde 642 077
- indefinit district annihan a	A \$1. X-Press Pointing & Body Width Idway 194 5 12 (ftr. 668 4740 ATCO Space Rentals	(237 Ref) 783 230 Accelerated Comprehender Seminars 753 197 Accelerated Legal Service Way 641 220 Acceler 73 240 Cem 754 579	
hete	700 1416 man 700 1416	Action M. Advantage Makes Water	ADVANCED AUTO
DOGN COMMETTEN 641 7318 MA STATE AUTOMOBILE	AYE T CHEMANY	PORes 1014 Wilms. 442 729	REPAIR & TOWING
MA STATE AUTOMOBILE	ECHAG CHSTANCE	Accountin Logal And 149 test Ward 468 93	965 (Hee Dr. Davis
	Dambage Regulation	According Logal Aid 189 tun Ward 462 729 According Logal Aid 189 tun Ward 462 139 According State 181 Hollington Services 642 139 According 304 Cache this Services 462 139 According 305 Cache this Services 750 760 According Providing 750 760	7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7
Des California State Automobile	No Charge To Fight Plate	Accurate Construction 756 760	Advanced Back Gurg-A Chicoproctic Personalis
Acceptation AAA 666 2758 120 Decir Caman by Wale 666 6800 (red 783 6610	pares 822 0400	Accurate Painting Accurate Painting Accurate Painting Commiss Bestary has reported.	14
the 13t leave Committe they dad date	International	Bigg Plantifungir & Cramium Brathard han Handwarder	Advanced Chipmentable Officers Wilson Dorold E
final 753 6610	2245 & Duboy Asserter	917 May 1991 Plant of the Plant	DC 11/64 (mel 8 fm) 753 218
plages Cal	20 042 2000 CO	ACCUTED THE COLUMN TO SERVICE CHESTAND	Advert of Mediating Services Mc
	2015 2 Dung ASSTURE 200 074 4000 201 201 201 201 201 201 201 201 201	CAME Commission ASP 510	448 # (may flow (4) ### ,648 420
STYLING CO.	EQUIPMENT	Anthon Starle A. Braber Of Bust Estate	Advented Water Technologies
A CONTRACTOR OF THE PARTY OF TH	E-milury)	Ely tions by Willed Res BIS horsest best William 642 272	Advanced Back Gure-A Chiroprocitic Personals 122 who late 162 203 Advanced Res Services
1000mg a Alf Conjument (30 7679)		Rex 845 Namuri Berd Widné	Affordable Air Conditioning & Heating AAA 797
750 1724	Sees Garage Salvers And Fax Sees 247 7000 Review 000 678 2000	ACKLEY GLORIA	Agrosoftware P03m 31s from 756 879 Affordable Air Conditioning & Meeting 766 797 Affordable Fundings & Waterbooks 758 230 AFFORDABLE FUNDINTLINE & WATERWEDS
(afficing 1249 Caretor Or Vapril 662 5789 796 2256	Imb		AFFORDAGLE FURNITURE & WATERWINE
	Lage segments Communications Systems Later 800 247 1212 Report 800 247 22121	A-BROKER OF REAL	ISI WALLA MAN
NPI	birt 300 347 1212	SALTAN AL VICIN	ATTO CORRESPONDE MANAGEMENT CO
	MGM	ESTATE 720 Main Went 662 967	0mm 734 398
Lane les	Table Control Comments 000 SC12	Anthon Street & SRC 178 for these SAP SATE	Windows
**** *** *** *** *** *** *** *** ***	Major Majo	Action Air Parachutes Ven Canin Arent Cash 753 265	151 Wido Nove 666 656 Affordable Insurance 756 101 Affordable Lock 756 101 Nove 661 332 Affordable Lock 956 460 Affordable Lock 956 460 Affordable Lock 956 460 Affordable Lock 956 460 Affordable 956 460
MOTED AND AND AND AND AND AND AND AND AND AN	SERVICES	Action Sal Sords	AS ACCESS
Market March worth 666 1361	- 674 : familierteretur Sancialist	Action Bus Company 2nd 12 Date	- Approximately A. Com. 1986 for the formation of the 1986 for 1986 for the formation of the 1986 for the 198
1966-Sept Summan Agent 758 2510	SEPPOLE INCOMES	Action Cigarine Services 757 007	ACCIT AUTO PARTE
100 Marie State 152 1554	Subsect Provides	Michigan State (1986) (1986) Anno 1984 (1986)	144 (North Berly
Merrito Marito Mallines Apart 758 2210 Marito Aparty Marito Mallines M	(Aprille 10280 415 442 2600	Adem Construction Co Inc	From Says (marries Calaphanes Cal
756 6185	Employment	17 febereten fo Dote .PSB 134	Apple Child Care 146 à Ders
	M	Advance Street advanced to 1.000 for the State of State 4.49 715	AGENT AND THE PROPERTY OF THE PARTY OF THE P



APPENDIX B

Pictures of Dunnigan, Businesses and Government Services







